



Garson, Segal, Steinmetz, Fladgate LLP

Robert Garson ♦  
 Thomas Segal ^  
 Michael Steinmetz ✕ \*  
 Chris Fladgate °  
 John Lane ✕

Kevin Murphy  
 Stephen Greenwald  
 Timothy Kendal ♦  
 Ilan Ben Avraham ▽  
 Kevin Kehrli

Tel: +1 (212) 380-3623  
 Fax: +1 (347) 537-4540

Additional Bar Memberships  
 ♦ England and Wales  
 ^ Paris  
 \* New Jersey

✖ Patent Bar  
 ° Victoria (Australia)  
 ▽ Israel

Email: [kk@gs2law.com](mailto:kk@gs2law.com)

Hon. Laura Taylor Swain  
 United States Courthouse  
 Southern District of New York  
 500 Pearl St.  
 New York, New York 10007

July 21, 2016

**VIA ECF & FIRST CLASS MAIL**

**Re: *Adar Bays, LLC v. Textmunication Holdings, Inc.* 16-cv-4235 (LTS)**

Dear Judge Swain:

This firm represents Adar Bays, LLC, (“Adar”), plaintiff in the above captioned action. I write to both express our appreciation to the Court for taking the time to hold a hearing on this matter on July 20, 2016, and to inform the Court that the parties have resolved this matter.

As counsel informed the Court prior to the conference, the parties had reached a tentative agreement in the early morning hours prior to the conference. However, the agreement involved the transfer and deposit of common stock, which can present both procedural challenges and opportunities for the parties to renege on the agreement. Accordingly, we requested that the Court proceed with the hearing in case defendant, Textmunications Holdings, Inc. did not perform.

We received confirmation from our client that the common stock has been received and deposited, so this matter is resolved. We again thank the Court for its time and effort in this matter.

Accordingly, we have sent a Notice of Voluntary Dismissal to the Orders and Judgment Clerk, which I attach hereto for reference.

Respectfully submitted,

\_\_\_\_\_  
 /s/  
 Kevin Kehrli

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ADAR BAYS, LLC

Plaintiff,

v.

TEXTMUNICATION HOLDINGS, INC.

Defendant.

**Civil Action No.: 16-cv-04235 (LTS)**

**NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO FEDERAL RULE OF CIVIL  
PROCEDURE 41 (a)(1)(A)(i)**

PURSUANT to Federal Rule of Civil Procedure 41(a)(1)(A)(i), plaintiff Adar Bays, LLC and its counsel hereby give notice that the above-captioned action is voluntarily dismissed, with prejudice, as against defendant Textmunication Holdings, Inc.

Dated: New York, New York  
July 21, 2016

**GARSON, SEGAL, STEINMETZ,  
FLAGGATE LLP  
ATTORNEYS FOR PLAINTIFF**

BY: /S/  
KEVIN KEHRLI (KK1536)  
MICHAEL STEINMETZ (MS3164)  
164 WEST 25TH STREET  
SUITE 11R  
NEW YORK, NY 10001  
TELEPHONE: (212) 380-3623  
FACSIMILE: (347) 537-4540  
EMAIL: KK@GS2LAW.COM